



US EPA RECORDS CENTER REGION 5



467823

August 19, 2011

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Subject: Additional Excavation of DS Tributary Work Plan Addendum  
Detrex Source Control Area – Fields Brook Superfund Site  
Detrex Corporation, Ashtabula, Ohio  
Docket No. V-W-98-C-450

Dear Mr. Thompson:

On behalf of Detrex Corporation (Detrex), URS Corporation (URS) is submitting this Work Plan Addendum for the additional investigation of a portion of the DS Tributary extending from State Road Bridge to the east along the DS Tributary. Per recent data provided to the United States Environmental Protection Agency (USEPA) by the Fields Brook Action Group (FBAG), Detrex has elected to complete additional sampling and evaluation in order to assess any potential impacts in this area. Since Detrex has previously submitted a Work Plan to address the DS Tributary area west of State Road, the addendum outlined herein provides details for proposed additional investigation for review by the USEPA prior to implementation.

#### **BACKGROUND**

In late July 2011, FBAG met with USEPA personnel and presented data obtained from sampling in the eastern portion of the DS Tributary. Detrex was not made aware of this data until after the meeting between FBAG and USEPA and has only recently had an opportunity to review the data. Based on discussion between USEPA and Detrex, an Addendum to the previously submitted Additional Excavation of DS Tributary Work (URS, 2011) was agreed to be prepared. Detrex intends to complete an additional investigation to evaluate sediment conditions along the eastern portion of the DS Tributary extending from the State Road culvert to the east approximately 400 feet. This is the same area that was previously sampled by Detrex on April 29, 2011, when URS and Detrex personnel completed a visual inspection of the DS Tributary, both upstream and downstream of the State Road Culvert. Sampling results were reported to USEPA in a letter dated May 24, 2011.

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Mr. W. Owen Thompson  
United States Environmental Protection Agency  
August 19, 2011  
Page 2 of 4

The results of the April 2011 sampling did not indicate any significant impacts and no DNAPL or sheen was noted at the time of the sampling. However, the data reported to USEPA by FBAG was not consistent with the April 2011 results. As a result, Detrex is proposing to perform additional investigation east of State Road Bridge along the DS Tributary sediments. Further details related to this investigation are outlined in the following proposed Scope of Work (SOW).

#### **SCOPE OF WORK FOR ADDITIONAL INVESTIGATION**

The area of proposed additional investigation is shown on **Figure 1**. Detrex will perform the following items as part of the proposed SOW for the eastern portion of the DS Tributary.

- Initial visual reconnaissance of the DS Tributary extending from the east side of the State Road culvert to approximately 400 feet east along the DS Tributary.
  - Field notes and a photographic log will be completed as part of the visual reconnaissance.
- Completion of a Closed Circuit Television (CCTV) camera inspection of the State Road drain and culvert, extending from east to west underneath State Road. Additionally, during the FBAG sampling event in June 2011, a reported 14-inch diameter line was identified as shown in **Figure 1**. The presence of this line was not previously known by Detrex and the origin of the line is undetermined. In order to further investigate this line Detrex also intends to complete a CCTV inspection of the 14-inch line. Further details are provided below.
- Completion of additional sediment sampling from the east side of State Road culvert to the east, approximately 400 feet along the DS Tributary. The sampling area and sample locations are also shown in **Figure 1**. Further details are provided below.
- Preparation of a letter report describing the visual reconnaissance, CCTV inspection, sediment sampling activities, and field results/observations, as appropriate will be prepared and submitted to the USEPA within 30 days following the receipt laboratory analytical data.

#### **CLOSED CIRCUIT TELEVISION (CCTV) INSPECTION**

URS proposes to conduct closed circuit television (CCTV) inspection for the 3' X 5' box culvert and adjacent 48" diameter storm pipe connecting the eastern and western sides of the DS Tributary underneath State Road. The inspection will provide a condition assessment of the pipeline. Additionally, the CCTV equipment also has the capability to investigate the previously unknown 14-inch line that was identified during the FBAG sampling event (see **Figure 1**).





Mr. W. Owen Thompson  
United States Environmental Protection Agency  
August 19, 2011  
Page 3 of 4

URS will utilize an Envirosight® 600 crawler camera to inspect the culvert. The camera would enter at the upstream end of the stream and head downstream to the outlet of the culvert. The camera has the ability to pan and tilt 360 degrees and zoom to identify problem areas. The camera is a robot type of camera that is controlled from a specialized truck used specifically for the inspection.

URS will attempt this inspection but may be prohibited by trapped pipes or debris. If necessary, a manned walk through of the pipe using a hand held video camera would be conducted to achieve the inspection. If a walk through is required, this will be completed using Confined Space Entry procedures and monitoring.

CCTV logs will be made that will include observations found during the inspections. URS will generate a letter report with the findings, logs and provide copies of the CCTV inspection on video tape or DVD.

#### **EASTERN DS TRIBUTARY SEDIMENT SAMPLING**

URS is proposing to sample sediments within the eastern portion of the DS Tributary at six (6) equally spaced locations, on approximately 75 foot spacing (see **Figure 1**). Sampling procedures will be similar to those previously approved and completed as part of the *Sediment / DNAPL Delineation Work Plan* (URS, 2009). Details related to the procedures are not reiterated herein, but a general overview of the sampling procedure is provided below.

Upon completion of the field reconnaissance, a sediment hand augering program will be conducted. It is anticipated that hand augering locations will be approximately 75 feet apart, beginning on the east side of the State Road culvert and extending to the east approximately 400 feet. At each location, a 3 ½ inch diameter hand auger will be advanced through sediment into underlying soil to a depth of approximately 2 to 3 feet below ground surface (ft-bgs). If water is present a 4-inch diameter PVC pipe will be driven into the channel to prevent surface water from entering the location during sampling. The depth of sediment will be recorded and a sediment sample will be collected at each of the six (6) locations (i.e., DSTSED2011-01 thru DSTSED2011-06). The sediment samples will subsequently be submitted for analytical testing. The sediment samples will be analyzed for volatile organic constituents (VOCs) utilizing USEPA Test Method 5035 – 8260B, and semi-volatile organic constituents (SVOCs) utilizing USEPA Test Method – 8270C. A location and elevation survey will be conducted using a GPS unit.

#### **REPORTING**

Following the completion of all proposed field work and the receipt of the data from the analytical laboratory, URS will prepare and submit a letter report, on behalf of Detrex, to the USEPA. The letter report will document the methodologies, observations, results, and data evaluation from the



Mr. W. Owen Thompson  
United States Environmental Protection Agency  
August 19, 2011  
Page 4 of 4

completed investigation. The letter report will be submitted within 30 days of the receipt of the analytical data.

**SCHEDULE**

Once USEPA has reviewed the Scope of Work for the proposed additional investigation in the DS Tributary channel area east of State Road, Detrex would like to implement the work as soon as possible. Detrex would like to complete this proposed work in conjunction with the previously scheduled western DS Tributary Excavation Work Plan which has already been approved by the USEPA. The DS Tributary work is tentatively planned for mid- to late-September 2011, pending favorable weather conditions.

If you have any questions regarding this submittal, please do not hesitate to contact me at 216-622-2432 at your convenience.

Sincerely,

**URS Corporation - Ohio**

A handwritten signature in cursive script that reads "Martin L. Schmidt".

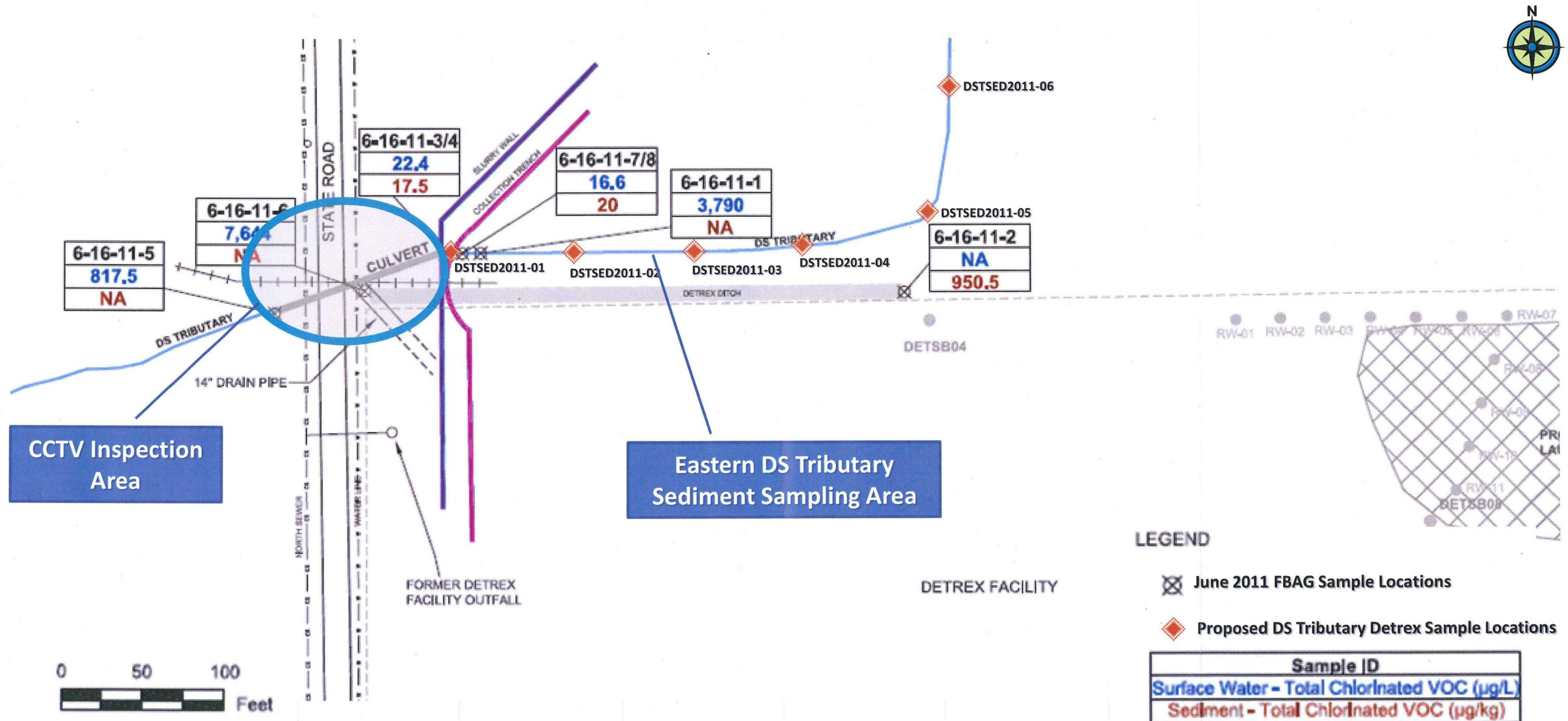
Martin L. Schmidt, Ph.D.  
Vice President

Enclosure – Figure 1

cc: R. Currie – Detrex Corporation  
T. Steib – Detrex Corporation  
T. Doll - Detrex Corporation  
D. Gray – URS Corporation  
R. Williams – Ohio EPA  
W. Earle – SulTRAC  
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# Detrex Site – Proposed Eastern DS Tributary Investigation Locations



**Note:** Figure reproduced from FBAG Slide (June 2011 USEPA Meeting)

**Figure 1**